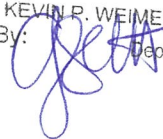


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OCT 14 2021

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF GEORGIA**

KEVIN P. WEIMER, Clerk
By:  Deputy Clerk

FEDERAL TRADE COMMISSION
AND STATE OF GEORGIA,

Civil Action No. 1:21-cv-03329-AT

Plaintiffs,

v.

STEVEN D. PEYROUX,
INDIVIDUALLY AND AS AN
OWNER AND OFFICER OF
REGENERATIVE MEDICINE
INSTITUTE OF AMERICA, LLC,
ALSO D/B/A STEM CELL
INSTITUTE OF AMERICA, LLC,
PHYSICIANS BUSINESS
SOLUTIONS, LLC, AND SUPERIOR
HEALTHCARE, LLC,

BRENT J. DETELICH,
INDIVIDUALLY AND AS AN
OFFICER OF REGENERATIVE
MEDICINE INSTITUTE OF
AMERICA, LLC, ALSO D/B/A STEM
CELL INSTITUTE OF AMERICA,
LLC,

REGENERATIVE MEDICINE
INSTITUTE OF AMERICA, LLC, A
LIMITED LIABILITY COMPANY,
ALSO D/B/A STEM CELL
INSTITUTE OF AMERICA, LLC,
PHYSICIANS BUSINESS
SOLUTIONS, LLC, A LIMITED
LIABILITY COMPANY, AND
SUPERIOR HEALTHCARE, LLC, A
LIMITED LIABILITY COMPANY,

Defendants.

**ANSWER AND AFFIRMATIVE DEFENSES TO COMPLAINT
FOR PERMANENT INJUNCTION, MONETARY RELIEF,
CIVIL PENALTIES AND OTHER RELIEF**

Defendant, Steven D. Peyroux, appearing *pro se*, hereby answers the Complaint and asserts his Affirmative and other defenses as follows:

1. The averments of Paragraph 1 constitute legal conclusions to which no responsive pleading is required. To the extent a response is required these allegations are denied.

2. The averments of Paragraph 2 constitute legal conclusions to which no responsive pleading is required. To the extent a response is required these allegations are denied.

JURISDICTION AND VENUE

3. The averments of Paragraph 3 constitute legal conclusions to which no responsive pleading is required. To the extent a response is required these allegations are denied.

4. The averments of Paragraph 4 constitute legal conclusions to which no responsive pleading is required. To the extent a response is required these allegations are denied.

5. The averments of Paragraph 5 constitute legal conclusions to which no responsive pleading is required. To the extent a response is required these allegations are denied.

PLAINTIFF

6. The averments of Paragraph 6 constitute legal conclusions to which no responsive pleading is required. To the extent a response is required these allegations are denied.

7. The averments of Paragraph 7 constitute legal conclusions to which no responsive pleading is required. To the extent a response is required these allegations are denied.

8. The averments of Paragraph 8 constitute legal conclusions to which no responsive pleading is required. To the extent a response is required these allegations are denied.

DEFENDANTS

9. The averments of Paragraph 9 constitute legal conclusions to which no responsive pleading is required. To the extent a response is required these allegations are denied.

10. The averments of Paragraph 10 constitute legal conclusions to which no responsive pleading is required. To the extent a response is required these allegations are denied.

11. The averments of Paragraph 11 constitute legal conclusions to which no responsive pleading is required. To the extent a response is required these allegations are denied.

12. The averments of Paragraph 12 constitute legal conclusions to which no responsive pleading is required. To the extent a response is required these allegations are denied.

13. The averments of Paragraph 13 constitute legal conclusions to which no responsive pleading is required. To the extent a response is required these allegations are denied.

14. Admitted.

15. Admitted.

16. The averments of Paragraph 16 constitute legal conclusions to which no responsive pleading is required. To the extent a response is required these allegations are denied.

17. The averments of Paragraph 17 constitute legal conclusions to which no responsive pleading is required. To the extent a response is required these allegations are denied.

18. The averments of Paragraph 18 constitute legal conclusions to which no responsive pleading is required. To the extent a response is required these allegations are denied.

19. The averments of Paragraph 19 constitute legal conclusions to which no responsive pleading is required. To the extent a response is required these allegations are denied.

20. The averments of Paragraph 20 constitute legal conclusions to which no responsive pleading is required. To the extent a response is required these allegations are denied.

21. The averments of Paragraph 21 constitute legal conclusions to which no responsive pleading is required. To the extent a response is required these allegations are denied.

22. The averments of Paragraph 22 constitute legal conclusions to which no responsive pleading is required. To the extent a response is required these allegations are denied.

23. The averments of Paragraph 23 constitute legal conclusions to which no responsive pleading is required. To the extent a response is required these allegations are denied.

24. The averments of Paragraph 24 constitute legal conclusions to which no responsive pleading is required. To the extent a response is required these allegations are denied.

25. The averments of Paragraph 25 constitute legal conclusions to which no responsive pleading is required. To the extent a response is required these allegations are denied.

26. The averments of Paragraph 26 constitute legal conclusions to which no responsive pleading is required. To the extent a response is required these allegations are denied.

27. The averments of Paragraph 27 constitute legal conclusions to which no responsive pleading is required. To the extent a response is required these allegations are denied.

28. The averments of Paragraph 28 constitute legal conclusions to which no responsive pleading is required. To the extent a response is required these allegations are denied.

29. The averments of Paragraph 29 constitute legal conclusions to which no responsive pleading is required. To the extent a response is required these allegations are denied.

30. The averments of Paragraph 30 constitute legal conclusions to which no responsive pleading is required. To the extent a response is required these allegations are denied.

31. The averments of Paragraph 31 constitute legal conclusions to which no responsive pleading is required. To the extent a response is required these allegations are denied.

32. The averments of Paragraph 32 and all of its subparts constitute legal conclusions to which no responsive pleading is required. To the extent a response is required these allegations are denied.

33. The averments of Paragraph 33 constitute legal conclusions to which no responsive pleading is required. To the extent a response is required these allegations are denied.

34. The averments of Paragraph 34 constitute legal conclusions to which no responsive pleading is required. To the extent a response is required these allegations are denied.

35. The averments of Paragraph 35 constitute legal conclusions to which no responsive pleading is required. To the extent a response is required these allegations are denied.

36. The averments of Paragraph 36 constitute legal conclusions to which no responsive pleading is required. To the extent a response is required these allegations are denied.

37. The averments of Paragraph 37 constitute legal conclusions to which no responsive pleading is required. To the extent a response is required these allegations are denied.

38. The averments of Paragraph 38, including all subparts, constitute legal conclusions to which no responsive pleading is required. To the extent a response is required these allegations are denied.

39. The averments of Paragraph 39 constitute legal conclusions to which no responsive pleading is required. To the extent a response is required these allegations are denied.

40. The averments of Paragraph 40 constitute legal conclusions to which no responsive pleading is required. To the extent a response is required these allegations are denied.

41. The averments of Paragraph 41 constitute legal conclusions to which no responsive pleading is required. To the extent a response is required these allegations are denied. The averments of Paragraph 37 constitute legal conclusions to which no responsive pleading is required. To the extent a response is required these allegations are denied.

42. The averments of Paragraph 42 constitute legal conclusions to which no responsive pleading is required. To the extent a response is required these allegations are denied.

43. The averments of Paragraph 43 constitute legal conclusions to which no responsive pleading is required. To the extent a response is required these allegations are denied.

44. The averments of Paragraph 44 constitute legal conclusions to which no responsive pleading is required. To the extent a response is required these allegations are denied.

45. The averments of Paragraph 45 constitute legal conclusions to which no responsive pleading is required. To the extent a response is required these allegations are denied.

46. The averments of Paragraph 46 constitute legal conclusions to which no responsive pleading is required. To the extent a response is required these allegations are denied.

47. The averments of Paragraph 47 constitute legal conclusions to which no responsive pleading is required. To the extent a response is required these allegations are denied.

48. The averments of Paragraph 48 constitute legal conclusions to which no responsive pleading is required. To the extent a response is required these allegations are denied.

49. The averments of Paragraph 49 constitute legal conclusions to which no responsive pleading is required. To the extent a response is required these allegations are denied.

50. The averments of Paragraph 50 constitute legal conclusions to which no responsive pleading is required. To the extent a response is required these allegations are denied.

51. The averments of Paragraph 51 constitute legal conclusions to which no responsive pleading is required. To the extent a response is required these allegations are denied.

52. The averments of Paragraph 52 constitute legal conclusions to which no responsive pleading is required. To the extent a response is required these allegations are denied.

53. The averments of Paragraph 53 constitute legal conclusions to which no responsive pleading is required. To the extent a response is required these allegations are denied.

54. The averments of Paragraph 54 constitute legal conclusions to which no responsive pleading is required. To the extent a response is required these allegations are denied.

JURY TRIAL DEMANDED.

AFFIRMATIVE DEFENSES

Defendant asserts the following affirmative and other defenses to the Complaint.

FIRST DEFENSE

Defendant is not subject to general or specific jurisdiction in this Court as to the claims brought by Plaintiffs against him.

SECOND DEFENSE

This Court is not the proper venue as to the claims Plaintiff brings against Defendant because the Court lacks personal jurisdiction over Defendant.

THIRD DEFENSE

Subject to proof through discovery, Plaintiffs' causes of action are barred, in whole or in part, by the statute of limitations and/or statute of repose.

FOURTH DEFENSE

Plaintiffs have failed to set forth claims which justify the relief they seek.

FIFTH DEFENSE

Plaintiffs request relief from the Court to which they are not entitled and which they cannot recover pursuant to applicable law and precedent.

SIXTH DEFENSE

Plaintiffs have failed to state viable causes of action against this Defendant.

Respectfully submitted this _____ day of _____ 20__.


Steven D. Peyroux, *pro se*

CERTIFICATE OF SERVICE

I hereby certify that on this 14 day of October, 2021, I served the ANSWER AND AFFIRMATIVE DEFENSES TO COMPLAINT FOR PERMANENT INJUNCTION, MONETARY RELIEF, CIVIL PENALTIES AND OTHER RELIEF upon counsel of record via Email and U.S. Mail, postage prepaid, as follows:

Elizabeth K. Nach, Esq.
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Steven D. Peyroux, *pro se*